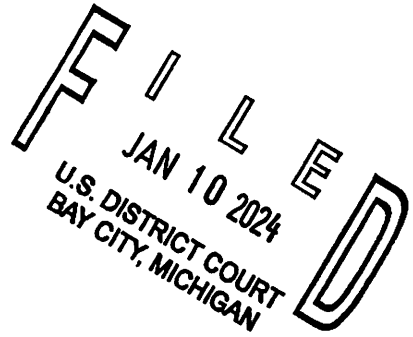


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION



UNITED STATES OF AMERICA,

Case No. 23-cr-20168

Plaintiff,

HON. THOMAS L. LUDINGTON

United States District Judge

v.

KIJUAN D. ROSS,

Violations:

21 U.S.C. § 841(a)(1)

18 U.S.C. § 924(c)(1)(A)(i)

18 U.S.C. § 922(g)(1)

Defendant.

18 U.S.C. §922(o)(1)

SECOND SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE

21 U.S.C. § 841(a) and 841(b)(1)(B)(viii)

On or about August 31, 2022, at a residence in the Eastern District of Michigan, KIJUAN D. ROSS knowingly possessed with the intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(B)(viii).

COUNT TWO
POSSESSION OF A FIREARM IN FURTHERANCE OF A DRUG
TRAFFICKING CRIME
18 U.S.C. § 924(c)(1)(a)(i)

On or about August 31, 2022, in the Eastern District of Michigan, KIJUAN D. ROSS, knowingly possessed a firearm, that is, one Feather, Model AT-9, 9mm caliber rifle, one Glock, Model 19, 9 mm caliber pistol, one Ruger, Model Mark IV, .22 caliber, semi-automatic pistol, one Ruger 57, Model 5.7, 5.7x28mm caliber, semi-automatic pistol, one Smith & Wesson, Model M&P, .40 caliber semi-automatic pistol, and one Weihrauch Windictor, Model 38 special, .38 caliber revolver, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute methamphetamine, as alleged in Count One of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(a)(i).

COUNT THREE
FELON IN POSSESSION OF A FIREARM
18 U.S.C. § 922(g)(1)

On or about August 31, 2022, in the Eastern District of Michigan, KIJUAN D. ROSS, knowing he had been convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, one Feather, Model AT-9, 9mm caliber rifle, one Glock, Model

19, 9 mm caliber pistol, one Ruger, Model Mark IV, .22 caliber, semi-automatic pistol, one Ruger 57, Model 5.7, 5.7x28mm caliber, semi-automatic pistol, one Smith & Wesson, Model M&P, .40 caliber semi-automatic pistol, and one Weihrauch Windicator, Model 38 special, .38 caliber revolver, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR
POSSESSION OF A MACHINEGUN
18 U.S.C. § 922(o)

On or about August 31, 2022, in the Eastern District of Michigan, KIJUAN D. ROSS, knowingly possessed a machinegun, that is, a Glock, Model 19, 9mm caliber pistol modified to fire automatically more than one shot without manual reloading by a single function of the trigger, in violation of Title 18, United States Code, Section 922(o).

FORFEITURE ALLEGATION

The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a). The allegations contained in Counts Two, Three, and Four of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 841, the defendant shall forfeit to the United States: (1) any property, real or personal, constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense; and (2) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

Pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), upon conviction of any offense(s) in violation of Title 18, United States Code, Sections 922(g) and 924(c), the defendant shall forfeit to the United States any firearms and ammunition involved in or used in the knowing commission of the offense(s).

THIS IS A TRUE BILL.

Dated: 01-10-2024

DAWN N. ISON
United States Attorney

s/Anthony P. Vance
ANTHONY P. VANCE
Assistant United States Attorney
Chief – Branch Offices

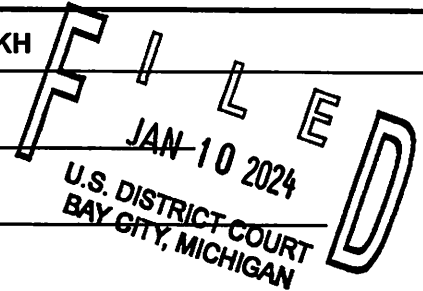
s/Grand Jury Foreperson
GRAND JURY FOREPERSON

s/Katharine Hemann
KATHARINE HEMANN
Assistant United States Attorney
101 First Street, Ste. 200
Bay City, Michigan 48708
Phone: (989) 891-0363
Katharine.Hemann@usdoj.gov

Companion Case information MUST be completed by AUSA and initialedUnited States District Court
Eastern District of Michigan**Criminal Case Cover Sheet****Case Number**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: KH


Case Title: USA v. Kujan D. Ross**County where offense occurred:** Saginaw County**Check One:** ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**☐ Indictment/ ☐ Information --- **no prior complaint.**☐ Indictment/ ☐ Information --- **based upon prior complaint [Case number:]**☒ Indictment/ ☐ Information --- **based upon LCrR 57.10 (d) [Complete Superseding section below].****Superseding Case Information****Superseding to Case No:** 23-cr-20168 **Judge:** Ludington

- ☒ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name**Charges****Prior Complaint (if applicable)**

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

Date: January 10, 2024

for 
 Katharine Hemann
 Assistant United States Attorney
 101 First Street, Suite 200, Bay City, MI 48708
 Fax: 989-895-5790
 E-Mail address: Katharine.hemann@usdoj.gov
 Attorney Bar #: WSBA # 46237

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.